

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS**  
**Bid Protest**

**FILED**

Feb 9 2018

U.S. COURT OF  
FEDERAL CLAIMS

\*\*\*\*\*  
TRANSWORLD SYSTEMS, INC.,

\*

Plaintiff,

\*

\*

Case No. **18-207 C**

\*

v.

\*

\*

THE UNITED STATES,

\*

\*

Defendant.

\*

\*

\*\*\*\*\*

**PLAINTIFF'S MOTION FOR A PROTECTIVE ORDER  
AND LEAVE TO FILE UNDER SEAL**

Plaintiff, Transworld Systems, Inc. ("TSI"), through its undersigned counsel, respectfully requests that the United States Court of Federal Claims grant it leave to file its bid protest complaint and accompanying exhibits under seal. Plaintiff further requests that the Court issue the standard protective order.

Plaintiff requests a protective order because its complaint and exhibits thereto may contain confidential and sensitive source selection material, including the proprietary information of plaintiff and the awardees. Plaintiff also notes that the administrative record produced by the Government will contain confidential and sensitive source selection material, including the proprietary information of plaintiff and the awardees, which should not be released publicly.

Therefore, in accordance with Appendix C, Rule 4 of the Rules of the Court of Federal Claims, plaintiff has marked the complaint as proprietary and confidential, and will concurrently file a proposed redacted version of this document with the Court.

Dated: February 9, 2018

Respectfully submitted,

s/Paul A. Debolt

Paul A. Debolt  
Michael T. Francel  
Chelsea B. Knudson  
VENABLE LLP  
600 Massachusetts Avenue, NW  
Washington, DC 20001  
(202) 344-8384 (Telephone)  
(202) 344-8300 (Facsimile)

James Y. Boland  
VENABLE LLP  
8010 Towers Crescent Drive, Suite 300  
Tysons Corner, Virginia 22182  
(703) 760-1997 (Telephone)  
(703) 821-8949 (Facsimile)

*Counsel for Transworld Systems, Inc.*